



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

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OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

March 11, 2009

Ms. Kimberly Kler
EIS/OEIS Project Manager
Naval Facilities Engineering Command Northwest
1101 Tautog Circle, Suite 203
Silverdale, WA 98315-1101

**RE: U.S. Environmental Protection Agency (EPA) review and comments for the U.S. Navy's (Navy) Northwest Training Range Complex (NWTRC) Draft Environmental Impact Statement/ Overseas Environmental Impact Statement (EIS/OEIS).
EPA Project Number: 07-035-DOD**

Dear Ms. Kler:

This review was conducted in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Under our policies and procedures, we evaluate the environmental impact of the proposed action and the adequacy of the impact statement. We have assigned an EC-2 (Environmental Concerns, Insufficient Information) rating to the Draft EIS/OEIS. A copy of the EPA rating system is enclosed.

EPA understands the need to conduct realistic training and appreciates the Navy's generally excellent environmental analysis. We remain concerned, however, about potential impacts from Mid-Frequency Active (MFA) sonar and training activities in the Olympic Coast National Marine Sanctuary (OCNMS).

To address our EC-2 rating and more fully protect the environment we recommend additional mitigation measures for Alternative 2 (40 CFR § 1502.14). Additional mitigation measures that we especially support include the incorporation of emerging technologies into marine mammal monitoring and mitigation measures and special restrictions for the OCNMS. The above and other concerns and recommendations are detailed in the enclosure.

Thank you for this opportunity to comment on the Proposed Action and if you have any questions please contact Erik Peterson of my staff at (206) 553-6382.

Sincerely,

/s/

Christine B. Reichgott, Manager
Environmental Review and Sediment
Management Unit

Enclosures:

EPA Region 10 Detailed Comments NWTRC Draft EIS/OEIS

EPA Rating System for Draft EISs

EPA REGION 10 DETAILED COMMENTS NWTRC DRAFT EIS/OEIS

Marine Mammals

Scientific Support for MFA Sonar Shut Down Zones

We are concerned that the Chapter 5 sub-section on “Alternatives Mitigation Measures Considered but Eliminated; Using larger shut-down zones” does not list the scientific support for the elimination of larger shut-down zones as a mitigation measure (See p. 5-26). We believe this sub-section over-emphasizes the limitations of lookouts for marine mammal monitoring and under-emphasizes the scientific support for the effectiveness of shut-down zones in precluding direct physiological effects from exposure to MFS sonar.

Recommendation:

We recommend that the Final EIS/OEIS’s version of Chapter 5 include specific references to the scientific support for current MFA sonar power down and shut down zones.

Emerging Technologies and Monitoring and Mitigation Measures for Marine Mammals

One need for the Proposed Action is to support the acquisition and implementation of advanced military technology into the Fleet. We understand that many of these new technologies are not developed to the point where they can be utilized as mitigation or monitoring tools for marine mammals. However, EPA believes emerging tools and techniques with the capability to contribute to marine mammal monitoring (e.g. Broad Area Maritime Surveillance (BAMS) UAS.) may lead to advances in the effectiveness of mitigation measures.

Recommendation:

EPA recommends that the Final EIS/OEIS include a description of how new and emerging tools and techniques might be incorporated into marine mammal monitoring and mitigation measures on the NWTRC.

Olympic Coast National Marine Sanctuary (OCNMS)

We are concerned that there are no special restrictions for the OCNMS. EPA believes that the OCNMS is an exceptional biological resource and special restrictions, if not regulated by law or policy but possible at little to no cost, are an appropriate aspect of good environmental stewardship.

Recommendation:

We recommend that the Final EIS/OEIS consider additional reasonable special restrictions protective of the OCNMS. For example, we believe adding a “No discharge” restriction for all waste types listed in Table 3.4-1 for some or all of the OCNMS would have water quality benefits.

Greenhouse Gas Emissions Analysis and Voluntary Reduction and Mitigation Measures

We believe that the EIS would be strengthened by including an annual greenhouse gas (GHG) emissions analysis and consideration of voluntary GHG reduction and/or offset measures. We believe that a GHG emissions analysis and the consideration of voluntary offset and/or

reduction measures is consistent with the Navy's stated need to "Maintain the long-term viability of the NWTRCT as a premiere navy training and testing area while protecting human health and the environment, and enhancing the quality, capabilities, and safety of the Range Complex"(p. ES-5). EPA supports GHG analyses to increase preparedness for and decrease potential costs associated with meeting local, county, state, regional, national, and international responses to climate change.¹

Recommendations:

We recommend that the Final EIS/OEIS quantify the annual GHG emissions that would occur as a result of training activities in the NWTRC. This estimate could be based on the same activities that are used to quantify the criteria pollutants in Appendix C of the Draft EIS/OEIS with one difference. Instead of limiting aircraft emissions to those occurring below 3,000 feet we recommend that the GHG analysis include all aircraft emissions.

For any GHG analysis which may be included in the Final EIS/OEIS we suggest utilizing an equivalencies calculator to translate emissions into terms that are easier to conceptualize. If the equivalency to passenger vehicles is deemed appropriate we suggest using EPA MOBILE6.2 fuel economy numbers (<http://www.epa.gov/OMS/climate/420f05004.htm>).

In the absence of regulatory standards for GHG emissions we suggest that the Final EIS/OEIS consider voluntary reduction and offset measures. We support these measures in the interests of energy conservation and good environmental stewardship. Potential voluntary measures (some of which the Navy is already utilizing) include, but are not limited to:

- "cold-ironing", including the use of modular and mobile energy sources;²
- alternative fuels in ships, airplanes, ground fleets and facilities;
- inclusion of operating criteria which maximize fuel efficiency when mission appropriate;
- business management practices which reduce personnel travel distance to and from their homes and duty stations;
- reduced travel to and from training locations within or outside of the NWTRC;
- commit all Naval Stations (NAS) to the Federal Green Challenge (<http://yosemite.epa.gov/r10/ECOCOMM.NSF/Federal+Green+Challenge/FedGreen>);
- maximum use of computer simulated training.

¹ Consider, for instance, Local Governments for Sustainability, King County Climate Plan, Northwest Regional Greenhouse Gas Initiative, Western Climate Initiative, the Energy Independence and Security Act of 2007 and the Bali Action Plan.

² See, for example, <http://www.cleanairmarinepower.com/>

The Environmental Risk of Tungsten Gunshells

We are concerned about the lack of environmental risk analysis for tungsten Close-In-Weapon System (CIWS) rounds. Tungsten is an “emerging contaminant” the environmental risk of which is relatively unknown.³

Recommendation:

We recommend that the Final EIS/OEIS discuss the environmental risk of CIWS tungsten rounds in the NWTRC. The CIWS analysis should address materials composition (e.g. cobalt, nylon, iron, nickel, bronze, tin and/or lead), the solubility of these materials in salt water and their potential toxicity for marine life.

³ <http://www.epa.gov/tio/download/contaminantfocus/epa542f07005.pdf>